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Attorney for Plaintiff,
ADAM TIMOTHY GROOM

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF CALIFORNIA**

ADAM TIMOTHY GROOM,

Plaintiff,

v.

COMMISSIONER OF SOCIAL SECURITY,

Defendant.

Case No. 2:23-cv-00174-AC

STIPULATION AND ~~PROPOSED~~ ORDER
FOR MODIFICATION OF SCHEDULING
ORDER [ECF No. 5]

[ECF No. 10]

Subject to the approval and any further orders of the Court, the parties, by and through counsel of record, stipulate and agree that the scheduling order for Social Security cases in this action [ECF No. 5] should be modified. Plaintiff's time to move for summary judgment should be extended from 7/14/2023 to 8/14/2023, all other deadlines to be determined by reference to the Court's scheduling order, and that good cause supports the extension of time.

This is Plaintiff's second request for modification of the scheduling order. Good cause supporting the extension of the filing deadline includes Plaintiff's counsel has been unable to complete Plaintiff's motion for summary judgment to the professional standards of the Court, as of the current deadline, despite diligence and requires the further extension to do so considering later intervening deadlines including a felony criminal trial beginning August 4, 2023. This request is made jointly in good faith, without dilatory motive, and not for purposes of undue delay or to prejudice the interest of any party.

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SO STIPULATED AND AGREED, June 14, 2023.

WEEMS LAW OFFICES

PHILLIP A. TALBERT,
United States Attorney
MATHEW W. PILE,
Assoc. Gen. Counsel, Soc. Sec. Admin.
Office of Program Litigation, Office 7
OSCAR GONZALEZ DE LLANO
Sp. Asst. U.S. Attorney

/s/Robert C. Weems

By: /s/ Oscar Gonzalez de Llano

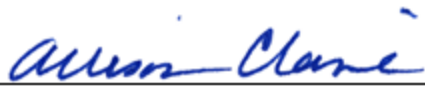
ROBERT C. WEEMS,
Attorney for Plaintiff

OSCAR GONZALEZ DE LLANO
Sp. Asst. U.S. Attorney,
Attorney for Defendant
(per email authorization)

~~[PROPOSED]~~ ORDER

SO ORDERED

DATED: July 19, 2023


ALLISON CLAIRE
UNITED STATES MAGISTRATE JUDGE